

MINORITY MEDIA AND TELECOMMUNICATIONS COUNCIL

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3636 16th Street N.W., Suite BG-54
Washington, D.C. 20010

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David Honig, Executive Director
Phone: (202)332-7005 Fax: (202)332-7511
e-mail: dhonig@crosslink.net

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October 17, 2002

Hon. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

RE: MB Docket No. 02-277 [Biennial Review of
Broadcast Ownership Rules]

MM Docket No. 01-235 (Broadcast/Newspaper
Crossownership)

MM Docket No. 01-317 (Local Radio Ownership)

MM Docket No. 00-240 (Definition of Radio
Markets)

Pursuant to 47 CFR §1.1206, this will disclose that in these permit-but-disclose proceedings, representatives of the Minority Media and Telecommunications Council ("MMTC"), the League of United Latin American Citizens ("LULAC") and the National Association of Black Owned Broadcasters ("NABOB") made an oral *ex parte* presentation at a Wednesday, October 16, 2002, 4:30 PM meeting with Commissioner Michael Copps and Alexis Johns, Esq., Legal Assistant to Commissioner Copps. Our delegation consisted of Eduardo Peña, Esq., communications counsel for LULAC, James Winston, Esq., Executive Director of NABOB, and myself.

We presented copies of the "Motion for Revision of Procedural Dates, Expansion of the Scope of the Proceeding, And Inclusion of Additional Studies in the Record" filed by MMTC and NABOB (dated October 9, 2002 and filed October 10, 2002). We maintained that because of the wide scope and complexity of the issues in the proceeding, the short time limits for public comment would ensure that parties would just submit their hard

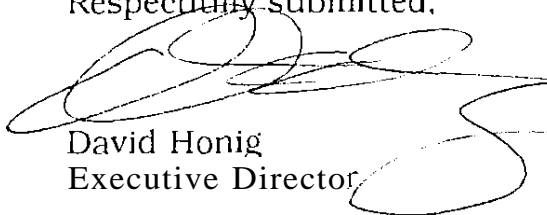
line views, without the benefit of consultation with other parties or empirical research. We stated that MMTC was going to convene a meeting of stakeholders in the next few weeks to examine how the issues in the proceeding can be narrowed, whether research can be performed jointly by the parties, and whether regulatory relief in these proceedings could be fashioned to promote minority ownership. We also stated that we favored broad public debate regarding the issues in the proceeding.

We discussed some of the fourteen FCC-sponsored research studies in the record, noting that while most of the studies appeared methodologically sound albeit limited in scope, the studies did not adequately address the issues of minority ownership and minority inclusion in program service.

We suggested that a supplement to the NPRM be issued to ask the parties to comment on how minority ownership would be affected and how it can be promoted through the ownership rules under consideration. Further, we suggested that the Commission should continue its policy, followed since 1995, of examining attribution rules in concert with its structural ownership rules. Finally, we urged the inclusion of five of the Section 257 (Adarand) studies in the record of the omnibus ownership proceeding.

An original and two copies of this letter are being filed with the Secretary

Respectfully submitted,



David Honig
Executive Director

cc: I-Ion. Michael Copps
Alexis Johns. Esq.

/dh